Document Log Item

Addressing			
From		**To**	
"Conlan, Linda" <Linda.Conlan@amec.com>		Carmen Santos/R9/USEPA/US@EPA	
CC		**BCC**	
"Stone, Bryan" <Bryan.Stone@amec.com>			
Description			Form Used: Memo
Subject		**Date/Time**	
PCBs: Former Pechiney Cast Plate Inc - Interim Cap		10/01/2010 09:43 AM	
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1	161,461		
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Body

Document Body

Carmen,

As a follow-up to the voice message I left you earlier this week, we have a few additional questions regarding the “Interim Cap” described in item C.3.e of the Conditional Approval letter dated July 2, 2010. Specifically with regard to the verbiage in item C.3.e on pages 5 and 6 (paraphrased below):

Paragraph 1, bottom of page 5: states that the interim cap is to be placed atop crushed concrete containing PCBs below the approved cleanup level for surface/shallow soils (i.e.< 5.3 ppm), and that an interim cap can consist of concrete with PCBs below 1 ppm (< 1ppm).

Paragraph 2, at the top of page 6: states the interim cap that would prevent infiltration is to be placed atop crushed concrete containing PCBs "below" 1 ppm.

I arrive at a different conclusion regarding what needs to be covered by the interim cap when I read each of these paragraphs. Our proposed approach for placing the interim cap is consistent with the statements in paragraph 1. For clarification, we are proposing the following (and please reply if you disagree with our clarification):

· Placement of an interim cap consisting of crushed onsite concrete containing PCBs at concentrations less than 1 ppm (<1 ppm) over only those areas that have been backfilled with crushed onsite concrete containing PCBs at concentration greater than 1 ppm (>1 ppm) but less than 5.3 ppm (<5.3 ppm) or where soil remains at the surface with PCBs >1 ppm but less than the proposed cleanup goal of 5.3 ppm.

· This interim cap would consist of a reduced infiltration layer comprised of compacted crushed concrete containing PCBs at a concentration <1 ppm. The cap would be constructed with sloped upper surfaces to promote drainage to a BMP controlled storm water collection area as opposed to allowing ponding and infiltration to occur.

· Crushed concrete containing PCBs at concentrations <1 ppm are also proposed for use during site grading as unrestricted fill materials without the placement of an interim cap of any type over these materials.

A conceptual figure depicting the interim cap is attached.

We have also considered other options for the colorant dye marker. Rather than using a dye to demarcate the area where on-site crushed concrete containing PCBs at concentration >1 ppm but less than <5.3 ppm is placed, we are proposing to use an HDPE brightly colored mesh identifier layer. Details of the HDPE material are shown on the attached figure.

Please let me know if you would like to discuss further.

Thank you,

Linda Conlan, PG | Senior II Geologist

AMEC Geomatrix, Inc.
510 Superior Avenue, Suite 200
Newport Beach, CA 92663

Main: 949.642.0245 | **Direct**: 949.574.7083 | **Cell**: 949.355.3631| **Fax**: 949.642.4474
E-mail: **linda.conlan@amec.com**

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